



## NORTH COAST INTEGRATED REGIONAL WATER MANAGEMENT PLAN

August 24, 2012

Department of Water Resources  
Division of Integrated Regional Water Management  
PO Box 942836  
Sacramento, CA 94236-0001  
Attention: Zaffar Eusuff

Re: Round 2, Proposition 84 and 1E Draft IRWM Program Guidelines and Round 2  
Implementation Proposal Solicitation Package Public Comment

Dear Mr. Eusuff,

The North Coast IRWMP (NCIRWMP) Policy Review Panel (PRP) appreciates the opportunity to provide input and comment on the Draft Proposition 84 and 1E Program Guidelines and Proposal Solicitation Package for the 2<sup>nd</sup> Round of Implementation Grants. Following are our comments.

### **Minimal Revisions, Streamlined Processes and Flexibility**

The NCIRWMP PRP appreciates the efforts DWR has made to minimize changes from Round 1 to Round 2 and to streamline the IRWM grant program where possible. These refinements allow the NCIRWMP to build upon and enhance the investments and accomplishments that have been made to date without having to respond to a new framework.

The IRWM Planning process has been exceedingly positive for the North Coast Region. Since the program's inception, DWR has been resolute in its recognition of the uniqueness of each IRWM region and this flexibility has provided the NCIRWMP with the ability to integrate and implement regional and statewide goals and objectives in a manner that is reflective of North Coast communities. We request your continued respect for the diversity of approaches to IRWM Planning throughout California.

### **Economic Analysis**

The NCIRWMP PRP would like to express support for the changes made to the Benefits and Cost Analysis section of the Proposal Solicitation Package. Although these sections have always proved taxing for our project proponents, it is undeniable that the region's projects and overall

proposal has been substantially improved as a result of being vetted through this process. The investments the NCIRWMP has made to rigor and technical merit as a result of the IRWM criteria has prompted the PRP to thoughtfully consider and work to identify opportunities to support the economic vitality of its communities through the NCIRWMP process. Additionally, having economic cost benefit information available has put North Coast projects and the NCIRWMP in a better position for match funding opportunities. The North Coast feels that this is a positive feature of the IRWM program and we are pleased to see that it continues to be retained.

### **Technical Justification of Projects**

The NCIRWMP PRP would like to express concern regarding the increased scoring, weight and discretion DWR has to alter a Region's funding allocation based on a proposal's ability to demonstrate technical feasibility or anticipated project benefits. These new criteria may be difficult thresholds for projects from our smallest, economically disadvantaged communities to meet and could be a deterrent to their participation in the IRWM process. Projects from economically disadvantaged communities generally face insufficient in-house technical resources and often lack the funds necessary to retain professional expertise to develop and determine best project alternatives. Consequently, the PRP is concerned that projects from and benefitting disadvantaged communities may lack the detail and supporting documentation required by DWR to determine the basis for a project.

In terms of equity, this requirement is structured such that the technical justification documentation provided from large entities would have a clear competitive advantage over projects from small, rural disadvantaged communities. To balance this inequity, the NCIRWMP proposes that DWR take these limitations into consideration, noting that projects from disadvantaged communities may not have the same access to supporting documentation to supplement their benefits as those provided from a larger entity with greater technical resources and capacity.

The NCIRWMP looks forward to continuing to work together on this important program. If you have any questions or would like more information, please feel free to contact me or Karen Gaffney at 707.433.7377 x2 or via email at [kgaffney@westcoastwatershed.com](mailto:kgaffney@westcoastwatershed.com). Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jake Mackenzie". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jake Mackenzie, Chair  
North Coast IRWMP Policy Review Panel  
City of Rohnert Park, Mayor